

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JUSTIN GUY,

Plaintiff,

Case No.: 20-cv-12734

Hon. Mark A. Goldsmith

v.

ABSOPURE WATER COMPANY, LLC,

Defendant.

_____ /

DECLARATION OF KEVIN PHIPPS

I, KEVIN PHIPPS, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I make this Declaration upon personal knowledge and state that the information specified below is true to the best of my knowledge and, if sworn as a witness, I would be competent to testify to the same.

2. I worked as a Truck Driver for ABSOPURE WATER COMPANY (“Defendant”) from to approximately September 2017 to August 2021.

3. Throughout my employment, I did not regularly drive routes that crossed state lines.

4. In fact, I estimate that 90% of my routes were exclusively in Michigan.

5. I also drove Absopure sprinter vans, which I understand to weigh less than 10,001 pounds on approximately 50% of my routes.

Dated: 07/20/23

kevin phipps
kevin phipps (Jul 20, 2023 10:49 EDT)

KEVIN PHIPPS